

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL BUSINESS MACHINES  
CORPORATION,

Plaintiff,

vs.

PLATFORM SOLUTIONS, INC. and T3  
TECHNOLOGIES, INC.

Defendants

Civil Action No. 7:06 cv 13565 (LAK )(THK)

Judge Lewis A. Kaplan

MOTION TO ADMIT COUNSEL  
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the  
Southern and Eastern Districts of New York, I, Tibor L. Nagy, a member in good standing of the  
bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Clement S. Roberts  
Keker & Van Nest LLP  
710 Sansome Street  
San Francisco, CA 94111  
TEL: (415) 391-5400  
FAX: (415) 397-7188

Clement S. Roberts is a member in good standing of the Bar of the State of California.

There are no pending disciplinary proceeding against Clement S. Roberts in any State or Federal  
court.

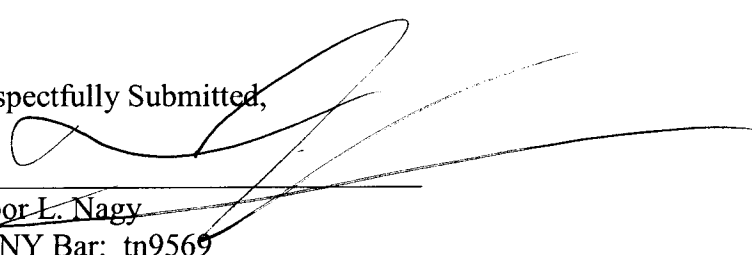
Dated: April 2, 2008  
City, State: New York, New York

APR 09 2008

FILED  
U.S. DISTRICT COURT  
2008 APR -9 AM 10:37  
S.D. OF N.Y.

540240-525  
DK

Respectfully Submitted,



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Tibor L. Nagy

SDNY Bar: tn9569

Susman Godfrey LLP

654 Madison Avenue, 5th Floor

New York, NY 10065

TEL: (212) 336-8330

FAX: (212) 336-8340

CERTIFICATE OF SERVICE


I hereby certify that a true and correct copy of the foregoing document MOTION TO ADMIT COUNSEL PRO HAC VICE has been served on this 2nd day of April, 2008, via U.S. Postal Service upon:

Richard I. Werder, Jr.  
QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP  
51 Madison Avenue, 22 Floor  
New York, NY 10017  
TEL: (212) 849-7000

Attorneys for Plaintiff  
International Business Machines corporation

David L. Patron  
Attorney for T3 Technologies, Inc.  
PHELPS DUNBAR LLP  
Canal Place  
365 Canal Street, Suite 2000  
New Orleans, LA 70130  
TEL: (504) 566-1311

Attorneys for Defendant  
T3 Technologies, Inc.

  
\_\_\_\_\_  
Tibor L. Nagy

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AFFIDAVIT OF TIBOR L. NAGY  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE

State of New York     )  
                                  )     ss:  
County of New York    )

Tibor L. Nagy, being duly sworn, hereby deposes and says as follows:

1. I am an associate at Susman Godfrey LLP, counsel for Defendant, Platform Solutions, Inc., in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Clement S. Roberts as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2003. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I am well acquainted with applicant for admission, Clement S. Roberts.
4. Mr. Roberts is a partner at Keker & Van Nest LLP, in San Francisco, CA.
5. I have found Mr. Roberts to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Clement S. Roberts, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Clement S. Roberts, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Clement S. Roberts, pro hac vice, to represent Defendant, Platform Solutions, Inc., in the above captioned matter, be granted.

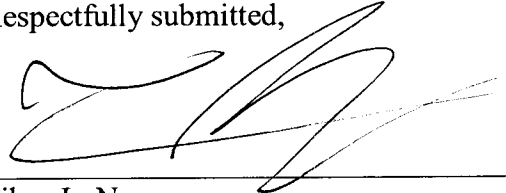
Dated: April 3, 2008  
City, State: New York, New York

Notarized:



ROBERTA ANN LEONE  
Notary Public, State of New York  
No. 24-4790044  
Qualified in Kings County  
Certificate Filed in New York County  
Commission Expires June 30, 2011

Respectfully submitted,



Tibor L. Nagy  
SDNY Bar Code: XXXXXX



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

March 28, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar CLEMENT SETH ROBERTS, #209203 was admitted to the practice of law in this state by the Supreme Court of California on December 4, 2000; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert  
Custodian of Membership Records

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vs.

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TECHNOLOGIES, INC.

Defendants

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Judge Lewis A. Kaplan

ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION

Upon the motion of Tibor L. Nagy attorney for Defendant, Platform Solutions, Inc., and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Clement S. Roberts  
Keker & Van Nest LLP  
710 Sansome Street  
San Francisco, CA 94111  
TEL: (415) 391-5400  
FAX: (415) 397-7188  
Email: croberts@kvn.com

is admitted to practice pro hac vice as counsel for Platform Solutions, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

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United States District/Magistrate Judge